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8 (702) 252-4673  
9 Attorney for Debtors

7 UNITED STATES BANKRUPTCY COURT  
8 DISTRICT OF NEVADA

9 In re:

10 Kristin E. Woods

11 Debtor(s)

Case No.: BK# 10-19122-LBR  
Chapter 13  
Kathleen A. Leavitt

Date: OST pending  
Time: OST pending

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14 **MOTION FOR ORDER SHORTENING TIME ON DEBTOR'S MOTION TO**  
15 **REINSTATE AUTOMATIC STAY**

16 COMES NOW the Debtors, Kristin E. Woods, by and through her attorney Anthony J  
17 Deluca, Esq., who respectfully files this Motion for Order Shortening Time on Debtors' **Motion**  
18 **to Reinstate Automatic Stay**, filed on the 11<sup>th</sup> day of March. As grounds for the Motion on  
19 Order Shortening Time, Anthony J. Deluca, represents that the Debtor has provided proof that  
20 the Debtor is Cramming the Fair Market Value of the rental property in question to be paid  
21 through the Chapter 13 Plan and that the Creditor proceeded with the foreclosure sale of the  
22 property before the deadline for the Order Approving the Reinstatement of the Automatic Stay  
23 granted on January 27, 2011. As such, the Debtors cannot wait for a hearing on the ordinary  
24 calendar if they are to rectify the foreclosure sale of the rental property in question.

25 Attorney **Anthony J. Deluca**, Esq.'s affidavit in support of Order Shortening Time is  
26 attached and advises the Court of specific details of Debtor's request to have the hearing heard  
27 on a shortened time.  
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4 **WHEREFORE**, Debtors humbly request this court to

- 5 1. Hear the **Motion to Reinstate Automatic Stay** on shortened time.

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7 DATED this 11th day of March, 2011

8 Submitted by:

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11 /s/ Anthony J. Deluca, Esq.

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Anthony J. Deluca, Esq.

14 DeLuca & Associates

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